

BROWN GAVALAS & FROMM LLP  
Attorneys for Petitioners  
ROXY INC., MEMPHIS SHIPPING PTE LTD.,  
DYNASTIC MARITIME INC. and  
SAMANTHA SHIPMANAGEMENT GROUP  
355 Lexington Avenue  
New York, New York 10017  
Tel: (212) 983-8500  
Fax: (212) 983-5946

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ROXY INC., et al.,

Case No: 12 Civ. 3625 (LAK)

*Petitioners,*

-against-

**AFFIDAVIT OF**  
**PATRICK R. O'MEA**

INTERNATIONAL OIL OVERSEAS INC., et al.,

*Respondents.*

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STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF NEW YORK    )

Patrick R. O'Mea, being duly sworn, deposes and says:

1.     I am an associate with the firm of Brown Gavalas & Fromm LLP, attorneys for Petitioners herein. I respectfully submit this affidavit in support of the Petition to Recognize, Confirm and Enforce Foreign Arbitration Award that was filed in the above-captioned action, and in opposition to Respondents' cross-motion to dismiss the Petition. The facts set forth herein are based upon my personal experience and by review of the file maintained at the above-named law firm.

2.     On May 8, 2012, I sent a copy of the following documents that were filed in this Action to Respondents by Federal Express courier:

- Summonses to International Oil Overseas Inc., Marina World Shipping Corp., Gresham World Shipping Corp., Tarazona Shipping Co., S.A., Quoin Island Marine WL, Bakri Trading Co. Inc., Schiff Holding Co. S.A., and Trans Mediterranean Shipping Inc.;
- Order to Show Cause and Temporary Restraining Order;
- Verified Petition to Recognize, Confirm, and Enforce Foreign Arbitral Award;
- Declaration of Stella Alexandri, dated May 2, 2012;
- Affidavit of Peter Skoufalos, dated May 8, 2012; and
- Memorandum of Law.

A copy of the Federal Express International Air Waybill for this shipment, package number 8721 6125 0749, is annexed hereto as Exhibit “A”.

3. The address used for Respondents was the Al Bakri Building, P.O. Box 3757, Al Andalus Street, Jeddah 21424, Saudi Arabia. I note that this was the same address used to serve the Respondents in *Andros Shipping Ltd. v. International Oil Overseas, Ltd.*, No. 11 Civ. 1657 (JGK) and I have reviewed numerous documents correlating this address to Respondents’ place of business.

4. I tracked this package via Federal Express’s website until it was delivered to Respondents. The “Tracking Results” for package number 8721 6125 0749 state that the package was “Delivered” and signed for by “M. OHI” in “Jeddah, Saudi Arabia” on May 12, 2012. A printout of the Tracking Results for package number 8721 6125 0749 is annexed hereto as Exhibit “B”.

5. On June 21, 2012, I received a Federal Express package, number 8993 2263 4998, which contained the same package that I sent to Respondents on May 8, 2012. The letters

“RTS,” which I understand to mean “return to sender,” were written over the May 8 package. I obtained the Tracking Results for package number 8993 2263 4998 and I observed that the package was shipped on June 19, 2012. I note that this package was delivered the day after Respondents filed their opposition to the Petition and their cross-motion to dismiss, and over a month after the original package was delivered to Respondents. A printout of the Tracking Results for package number 8993 2263 4998 is annexed hereto as Exhibit “C”.

6. Based on the foregoing, I believe that the package containing the documents listed above was, in fact, delivered to the Respondents by Federal Express Courier, as required by the Order to Show Cause, and so service was made in accordance with that Order.

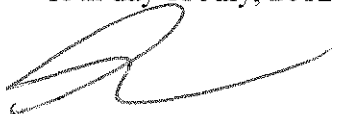
7. Additionally, I oversaw service of the same documents listed above upon Respondents’ counsel, Michael E. Unger, of Freehill Hogan & Mahar LLP. Specifically, I directed Keren Busani-Halevi, a paralegal in my office, to deliver these documents to Respondents’ counsel’s office and she has confirmed to me that she did so by delivering the documents to a receptionist at counsel’s office.

Dated: New York, New York  
July 13, 2012



PATRICK R. O'MEA

Sworn to before me this  
13th day of July, 2012



Notary Public

EVAN B. RUDNICKI  
Notary Public of the State of New York  
No. 02RU6142314  
Qualified in New York County  
Term Expires March 13, 2014